

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ROBERT TAYLOR
P.O. BOX 12524
PHILADELPHIA, PA, 19151**

CASE NO.2-17-cv-03369

CIVIL ACTION NO.17-3369

Plaintiff

V.

**THE COMMONWEALTH OF PENNSYLVANIA
COMMONWEALTH OF PENNSYLVANIA
DISTRICT ATTORNEYS OFFICE
3 s. PENN SQUARE
PHILADELPHIA, PA, 19107**

MOTION TO THE COURT

AMENDED

**THE COMMONWEALTH COURT
PHILADELPHIA CRIMINAL
JUSTICE CENTER (CJC)
1301 FILBERT STREET
PHILADELPHIA PA 19107
AND
CURRENTLY OFFICIAL
JUDGE FRANK PALUMBO**

**COMPLAINT
JURISDICTION**

**THE CITY OF PHILADELPHIA
C/O CITY OF PHILADELPHIA
LAW DEPARTMENT
1515 ARCH STREET, 14TH FLOOR
PHILADELPHIA, PA, 19102**

**AND
CURRENTLY CITY OF PHILADELPHIA POLICE
OFFICER OBRIEN #7461 AND UNNAMED
AND UNKNOWN CITY OF PHILADELPHIA
POLICE OFFICERS**

1. This Action Arises Under The First, Fourth, Eighth, And Fourteenth Amendments To THE CONSTITUTION OF THE UNITED STATES, And Action Is Brought Pursuant To 42 U.S.C. s 1983 Jurisdiction Is Based on 28 U.S.C. s 1331 and 1343 (1), (3), (4) And The Aforementioned Statutory Provision. Plaintiff Further Invokes The Supplemental Jurisdiction Of This Court To Hear And Adjudicate State Law Claims Pursuant to 28 U.S.C. s 1367 (a) To Hear And Adjudicate State Law Claims. Pursuant 28 U.S.C. s 1746. And Of The Federal Rules Of Civil Procedure Rules 3, 4 (a) (1), (b), (c) (1), Rule 7 (b) (1) Motions, And Rule 15. Amended

**THE PHILADELPHIA PRISON SYSTEM/
DEPARTMENT OF PRISONS
CURRAN-FROMHOLD
CORRECTIONAL FACILITY (CFCF)
7901 STATE ROAD
PHILADELPHIA, PA, 19136**

**AND
CURRENTLY WARDEN GERALD MAY
AND PRISON OFFICIAL SGT.
LEBESCO**

**THE PHILADELPHIA SHERIFFS OFFICE
LAND TITLE BUILDING
100 s. BROAD STREET
PHILADELPHIA, PA, 19110**

**THE PHILADELPHIA PUBLIC DEFENDERS
ASSOCIATION
1441 SAMSON STREET
PHILADELPHIA, PA, 19102**

**AND
CURRENTLY PUBLIC DEFENDER
CHRIS ANGELO**

DEFENDANT (S)

PARTIES

- 2. Plaintiff, Robert Taylor who has a current address of P.O. box 12524 Philadelphia, PA 19151**
- 3. Defendant The Commonwealth of Pennsylvania.**
- 4. Defendant The Commonwealth Court (CJC) Criminal Justice Center, which employs official and currently Commonwealth Court judge referred to in the caption above.**
- 5. Defendant The City Of Philadelphia is a Municipality Of The Commonwealth Of Pennsylvania and owns, operates, manages, directs, and controls The Philadelphia Police Department which employs the currently City Of Philadelphia Police Officer and unnamed and unknown City of Philadelphia Police Officers, The Philadelphia Prison System/Department Of Prisons which employs (CFCF) and its warden and Prison Officials, The Philadelphia Sheriffs Office, And The Philadelphia Public Defenders Association and Currently Public Defender referred to in the caption above.**

6. Defendants The Commonwealth Of Pennsylvania, The City Of Philadelphia, The Philadelphia Prison System/Department Of Prisons, The Philadelphia Sheriffs Office, The Commonwealth Court Philadelphia Criminal Justice Center, The Philadelphia Public Defenders Association. Also the currently Judge is an Official and employee of The Commonwealth Philadelphia Criminal Justice Center, The City Of Philadelphia Police Officer, And unnamed and unknown City Of Philadelphia Police Officers are employees Of The Philadelphia Police Department, (CFCF), The warden and Prison Officials referred to in the caption above are employees of The Philadelphia Prison System/Department of Prisons, The Public Defender referred to in the caption above is a employee of The Philadelphia Public Defenders Association, And at all times relevant to the facts, statements and averments of this complaint were acting under color of state law, And are being sued in their official and individual capacities. CITING: **MONELL v. DEPARTMENT OF SOCIAL SERVICES OF CITY OF NEW YORK, N.Y. 1978, 98 S.CT. 2018, 436 U.S. 658, 56 L.ED. 2D 611.**

FALSE ARREST, IMPRISONMENT

7. Plaintiff was unconstitutionally falsely arrested, searched, seized, and otherwise false imprisoned by the Philadelphia police department.

8. On/ around November 16, 2015 approximately 10:00 am on the 1-100 block of n. 60 street Philadelphia, Pa, 19139, plaintiff was unreasonably summoned to stop on the sidewalk by members of the Philadelphia police department. Officer (s) Obrien badge no. 7461 with an accompanying officer. Plaintiff had not violated any laws precipitating this incident stop.

9. Plaintiff was then subjected to arrest and unreasonable search and seizure by officers mentioned above without cause. Also his personal property consisting of a bag of hygienics were seized and never returned. CITING: **SEXTON v. GIBBS, D.C. TEX 1970, 327 F. SUPP. 134 AFFIRMED 446 F.2D 904 CERTIORARI DENIED 92 S. CT. 733, 404, U.S. 1062, 30 L.ED. 2D 751.**

10. Plaintiff was then taken to 18 police district without being charged then brought out and taken to 19 police district station parking lot. Where he was held in handcuffs in back of police vehicle for approximately 3 hours never entering station while arresting officers conversed with other officers including superior ranked officer.

11. During this incident stop Plaintiff was subjected to harassing unwarranted questioning and undue pain and duress from being handcuffed in police vehicle for hours.

12. Plaintiff was then taken back to 18 police district where he was detained without charge or due process.

13. On/around November 17, 2015 Plaintiff was then imprisoned at the (CFCF) curran-fromhold correctional facility under pp no. 946529

14. Throughout incarceration Plaintiff has been hauled back and forth to (CJC) The criminal justice center every 60-90 days by the Philadelphia sheriffs office, for which no criminal proceedings have ever taken place until the day of his release nearly 2 years later.

15. Judge Frank Palumbo is given to inference of conspiring with defendants to violate civil rights of Plaintiff under pretense of providing false information to keep him in prison. Plaintiff has never had a criminal case before said Judge or criminal proceeding before his detention, after nearly 2 years on July 12, 2017 Plaintiff had proceeding not having criminal charges or case he was released under alleged probation for which there were no documents furnished certified or otherwise, Plaintiff contends against this allegation.

16. Judge Frank Palumbo is in clear absence of all jurisdiction. In connection with commonwealth (CJC) court system have provided and fabricated uncertified Court information regarding Plaintiff.

17. Plaintiff while detained at (CJC) has been subjected to harsh condition of inadequate food and drink. And overcrowded cold cells for which he had to stand for hours unable to sit even thou there were other empty cells available.

18. Plaintiff having anemia, asthma, and other medical problems has had to undergo these confinement conditions for up to 8 hours while in the custody of The Philadelphia sheriffs.

19. The Philadelphia Sheriffs Office has conspired with defendants to violate civil rights of Plaintiff.

20. The commonwealth (CJC) court system, (CFCF) prison and its aforementioned officials has conspired to allege detainment under mental health. To unconstitutionally and unlawfully keep Plaintiff further imprisoned. CITING: RUHLMAN v. ULSTER COUNTY DEPPARTMENT OF SOCIAL SERVICES, N.D.N.Y. 2002, 234 F.SUPP. 2D 140.

21. Plaintiff was never determined mentally incompetent. Or actually admitted to a mental health facility or furnished with any written notice or certified documents thereof.

22. The Philadelphia public defenders association conspired with defendants to misrepresent Plaintiff as to have him further detained in prison.

23. On/around January 23, 2017 Plaintiff sent a formal termination in writing to The Philadelphia public defenders association for any possible alleged representation of Plaintiff for which he never authorized or had knowledge thereto.

MAIL TAMPERING – DENYING ACCESS TO THE COURT

24. Plaintiff was denied and obstructed by prison authorities and other conspiring entities of his right to petition and access to the court. Inmate mail is not to be opened outside of the presence of inmate as Held. CITING: WOLFF v. MCDONNELL, U.S. NEB. 1974, 94 S. CT. 2963, 418 U.S. 539, 41 L.ED. 2D 935, 710.

25. On/around may 19, 2016 Plaintiff filed petition pursuant to 28 U.S.C. s 2241 Habeas Corpus to this court. Submitted May 4, 2016 typed up and resubmitted later with form of court. CASE NO: 2:16-cv-02444-JHS and CIVIL ACTION NO: 16-CV-2444.

26. On/around June 24, 2016 Plaintiff put in grievance for court mail tampering. As this incident occurred numerous times prior to this date. Plaintiff was given his court mail opened and resealed back prior to receiving even bearing clerks name unusually stamped outside front of envelope.

27. On/around July 14, 2016 Plaintiff put in grievance for court mail tampering. Document(s) came from this court for action in his petition. Mail was opened and tampered with before arrival to Plaintiff.

28. On/around August 8, 2016 Plaintiff put in grievance for court tampering. Documents arrived from this court opened and resealed back. Plaintiff seen unit management official on/around July 19, 2016 about this obstruction and violation. But this problem was never rectified.

29. Plaintiff could not verify orders and instructions with certainty from The Court or Clerk of Court as information therein was inconsistent and rearranged due to this tampering and intrusion by prison authorities. Mail from courts, inspection is limited to locating contraband, it does not entail reading an enclosed letter. Reiterated in case CITING: TAYLOR v. STERRETT, C.A.5 (TEX.) 1976, 532 F.2D 462.

30. In reference to paragraphs 24-29 above. Plaintiff was precluded from his constitutional and civil rights. He was on a timely filing schedule therefore could not respond to the court which brought about an order against him. Violating the rights of Plaintiff to unrestricted private correspondence with The Court.

31. On/around August 30, 2016 Plaintiff Filed notice of appeal on U.S.C.A. Appeal form (10/1/04), and typed up detailed Appeal with exhibits and a money order for filing fee to The U.S. COURT OF APPEALS – THIRD CIRCUIT. Refuting by facts as to respondents not being required by court rules to answer certifying show of cause of his detention, in the report and recommendation of U.S. Magistrate Hon. Judge Strawbridge.

32. Also brought on appeal was the constitutional and civil rights violation by interfering with court correspondence that resulted in adoption and order of U.S. District Court Hon. Judge Slomsky.

33. On/around September 16, 2016 Plaintiff put in grievance for mail tampering and interception. Mail document(s) from U.S. Court in response to his appeal was brought clearly opened and tampered with. Legal Court mail sheet was purposely provided with out name of Plaintiff. These Court documents, as well as the Appeal with filing fee payment were confiscated and never returned back to The Court or given to Plaintiff.

34. Plaintiff was precluded from his right in pursuit of Appeal. CITING: HOUGHTON v. SHAFER, 392 U.S. 639, 20 L. ED. 2D 1319, 88 S.CT. 2119 (1968).

35. In reference to paragraphs 1–34 above see EXHIBIT (A).

OVERCROWDING - CONDITIONS OF CONFINEMENT

36. Since and throughout duration of detention of Plaintiff at (CFCF) institution which Warden Gerald May is Custodian. He has been held unconstitutionally.
CITING: U.S. EX REL. WOLFISH v. LEVI, S.D.N.Y. 1977, 439 F.SUPP. 114 AFFIRMED 573 F.2D 118 CERTIORARI GRANTED 99 S.CT. 76, 439 U.S. 816, 58 L. ED. 2D 107 REVERSED ON OTHER GROUNDS 99 S.CT. 1861, 441 U.S. 520, 60 L. ED. 2D 447.

37. On/around August 24, 2016 Plaintiff put in grievance for overcrowding. He has been subjected to severe overcrowded conditions. Being put in 3 inmates to a cell triple-celling which are only to hold 2 inmates and even 4 inmates to a cell quadruple-celling. And have over periods been forced to confinement in this manner for up to twenty or more hours out of a twenty-four hour period.

38. While in this overcrowded condition the third person lays down on the floor in a plastic “boat.” Otherwise subjective harsh dehumanizing conditions of confinement.

39. On/around November 22, 2016 Plaintiff put in grievance for cold air, during which having been in severe cold temperature, suffering from anemia, everyday he has had to endure this intolerable condition.

40. Due to this overcrowding and other reasons there is lack of sufficient amount of healthy, and efficiently prepared food, minute portions of food are served on very small trays inadequate for adult inmates, excessive lockdowns and restrictions of movement for activities, corporal punishment which adds on more to lock-ins, when inmates are let out at times are abruptly rushed back in cells for no reason as a way of toying with the inmates, also causes hygiene problems as it limits opportunities to shower and wash, thus shocking the conscience.

41. On/around October 25, 2016 Plaintiff put in grievance for unreasonable searching. Plaintiff was subjected to in cell strip search in front of other inmates with no precipitation prior, this is a monthly prison practice occurrence, visiting searches are of the same manner, he is also put to unnecessary aggravated invasive body searches coming and going throughout the institution.

42. There is also searching being practiced in the institution by non-male officers which practice aggravates rather than mitigates disparity of prison environment and society at large, even as there are metal detectors and male correctional officers along corridors and routes.

43. On/around July 7, 2017 Plaintiff put in grievance for incident that occurred on June 25, 2017 On/around 9:45 pm c/o officers Sgt. Lebesco and c/o A. Smith conducted an unreasonable search and assault on Plaintiff/Petitioner in his cell, following the strip search c/o A. Smith at the directive of Sgt. Lebesco discharged his weapon at Plaintiff of chemical spray into his facial and eyes without provocation; He was kept in restraint for approximately 45 minutes in this state while suffering injury, otherwise assault.

44. The actions and directives of the sergeant establish pellucid facts of connection between supervising official and constitutional deprivation.

45. In reference to paragraphs 36-44 above see EXHIBIT (B).

RELIGIOUS DEPRIVATION, DISCRIMINATION, AND DENIAL OF FREE EXERCISE

46. Plaintiff has been subjected to religious deprivation, denial of service and free exercise of his religious beliefs, solely because of his Islamic faith. CITING: CRUZ v. BETO, TEX 1972, 92 S.C.T. 1079, 405 U.S. 319, 31 L.ED. 2D 263.

47. On/around March 17, 2016 Plaintiff put in grievance for religious dietary deprivation, he is continually denied proper food of his religious mandate, institution is required to provide religious inmate his dietary. Also CITING: U.S. EX REL. WOLFISH v. LEVI, S.D.N.Y. 1977, 439 F. SUPP. 114 AFFIRMED 573 F.2D 118. In respect to diet.

48. On/around June 3, 2016 Plaintiff put in grievance for denial of religious exercise, he has been blocked and denied religious worship and assemblage on the housing block by prison authorities with no institutional infractions precipitating this infringement.

49. On/around June 10, 2016 Plaintiff put in grievance on deprivation of religious provisions. This occurred during his religious month of observance, 30 day abstention from food and drink during the day not only was he not provided his religious food Plaintiff was also subjected to excessive lockdowns, restricted to cell, and not brought any food or drink whatsoever until 1 to 2 hours after required time to eat and drink. Having gone all day without this provision. And otherwise caused to unduly suffer.

50. On/Around December 21, 2016 Plaintiff put in grievance for continual religious deprivation. Plaintiff is supposed to be provided reasonably for religious tenets. While the other religious faiths are provided space, area, and a religious chaplain for their religion therefore allowed to leave housing block up to 3 times a day for religious exercise. Plaintiff and his religious beliefs are discriminated against and not afforded same opportunities, provisions.

51. On/around March 3, 2017 Plaintiff put in grievance for deprivation of religious service. Once a week service is to be held which he has been so deprived of that Plaintiff has went months without one. This service is a mandatory requirement of his religious faith.

52. Plaintiff has to go through disparaging and harassing conduct of prison officials to attend service or not even attend at all. As non-male correctional officers perform body pat-frisk searches, which is against religious beliefs of Plaintiff to have this physical contact with the opposite sex. These religious issues have been effective since aforementioned date, throughout 2017 until present.

53. The warden has causal connection by history of widespread violations putting warden on notice of the need to correct the deprivation and he failed to do so. The Practice "Custom or Policy" of the warden resulted in violating the constitutional rights of Plaintiff.

54. Supporting inference that the warden directed the subordinates to act unlawfully or knew that the subordinates would act unlawfully and failed to stop them from doing so.

55. In reference to paragraphs 46-54 above see EXHIBITS (C).

SPECIAL DIETARY AND MEDICAL DEPRIVATION

56. Plaintiff has medical special dietary needs regarding proper nutritious food, supplements and vitamins of which he has been refused service and purposely denied of this provision, and of serious medical needs.

57. On/around January 1, 2016 Plaintiff put in grievance. Plaintiff was treated deliberately indifferent to special dietary needs. He sought issuance of vegetarian meals, nutritious health shakes and vitamins for considerable health condition. That brought about severe weight loss, lightheadedness and sickly condition, as he suffers from low blood sugar, thyroid, and anemia.

58. On/around December 26, 2016 Plaintiff put in sick call request. To doctor for his needs of medical special dietary as he was unable to eat soy meat and regular served trays. Due to his malnutrition and physical condition he fell approximately 40 pounds below weight during that period.

59. Only after going more than a year of being disregarded and ignored was Plaintiff issued partial special dietary for his issues. But (CFCF) medical was still deliberately indifferent to the needs of Plaintiff.

60. On/around February 19, 2017 Plaintiff put in sick call request. For medical to stop issuing food packs with meat, as Plaintiff was prescribed vegetarian diet and could only eat vegetarian meals.

61. On/around February 22, 2017 Plaintiff put in sick call request for prescribed health shakes. Plaintiff was informed he had been prescribed health shakes for his physical condition back in November 2016. But (CFCF) would not administer special dietary shakes to Plaintiff.

62. On/around March 12, 2017 Plaintiff put in grievance to Aramark. The (CFCF) food and special dietary distributor for deprivation of food and special dietary. For which deprivation caused severe illness and worsened condition of Plaintiff.

63. Plaintiff has been deprived of serious medical needs. He has natural born asthma breathing condition. That (CFCF) medical has on documented records. (CFCF) medical refused to allow him a required breathing inhaler for more than a year since initial incarceration. On/around November 18, 2016 Plaintiff was issued breathing medication thereafter was abruptly stopped. CITING: ESTELLE v. GAMBLE, 429 U.S. 97, 97 S.Ct. 285, 50 L.Ed. 2d 251 (1976.)

64. On/around April 17, 2017 Plaintiff put in sick call request for breathing inhaler refill. He was empty and suffering from severe shortness of breathe, and had already been refused refill by medical.

65. On/around April 21, 2017 Plaintiff put in grievance for incident referred to in paragraph 64. Above on April 17, 2017. Plaintiff had to go to medical emergency for asthma attack after being ignored by medical.

66. On/around April 21, 2017 Plaintiff put in grievance for following incident referred to in paragraph 65. Above. For being denied emergency medical treatment. He required breathing treatment for an asthma attack. But was refused treatment in disparaging manner by triage medical.

67. On/around July 7, 2017 Plaintiff put in grievance for medical denial relating to incident that occurred on June 25, 2017 on/around 10:00 pm. Plaintiff was brought into medical unit clearly injured suffering excruciating pain in area of face and eyes, blinded, and having chemical allergic reaction caused by chemical spray of prison officials. For approximately 45 min(s) Plaintiff remained in medical unit handcuffed behind his back in this way, and was purposely, deliberately refused decontamination and medical attention.

68. (CFCF) and its medical unit have been deliberately indifferent to the needs of Plaintiff by improper treatment mistreatment, and non-treatment purposely to cause mental and physical anguish.

69. In reference to paragraphs 56-68 above see EXHIBIT (D).

70. The incidents described above as a result of confinement at (CFCF) prison. Plaintiff over the past 2 years has been put to conditions conducive to torture.

FIRST CAUSE OF ACTION – 42 U.S.C. s 1983

71. Plaintiff incorporates paragraphs 1-70 above as though fully set forth herein by reference.

72. As a direct and proximate result of the defendants conduct. Which was committed under color of state law. Plaintiff was deprived of his Right To Access to The Court, To Petition For Redress Of Grievance, To Freedom Of Religion, To Be Free From False Arrest, Unreasonable And Excessive Force, Unlawful Seizure, False Imprisonment, Cruel And Unusual Punishment, Deprivation Of Life Liberty Or Property, Right To Due Process Clause, Equal Protection Of The Laws Clause, And Rights, Privileges, And Immunities Clause. As a result of the Defendants conduct Plaintiff suffered violation of his rights under The Laws and THE CONSTITUTION OF THE UNITED STATES, In particular, The First, Fourth, Eighth, And Fourteenth amendments thereof, and 42 U.S.C. s 1983.

73. As a direct and proximate result of the acts of the defendants, Plaintiff has suffered and continues to suffer severe emotion distress, loss of freedom and liberty, loss of enjoyment of life, and economic loss. All to his detriment and harm.

74. Defendants have by the above described actions deprived Plaintiff of Rights secured by The First, Fourth, Eighth, and Fourteenth Amendments to THE UNITED STATES CONSTITUTION in violation of 42 U.S.C. s 1983.

WHEREFORE, Plaintiff Requests The Following Relief:

- a. **Compensatory Damages; Amount Of 23,000,000 (Twenty Three Million Dollars).**
- b. **Punitive Damages; Amount Of 3,000,000 (Three Million Dollars).**
- c. **Reasonable Fees And Costs; Amount Of 1,310 (One Thousand Three Hundred Ten Dollars).**

- d. Such Other And Further Relief As Appears Reasonable And Just;
- e. Enjoining And Enforcement On Defendants;
- f. Order By The Court As To Each Defendant And As To Each Count.

**SECOND CAUSE OF ACTION
SUPPLEMENTAL STATE CLAIMS**

75. Plaintiff incorporates paragraphs 1-74 above as though fully set forth herein.

76. The acts and conduct of the Defendants, in this cause of action constitute Assault, Battery, Kidnapping, Robbery, Defamation, Invasion Of Privacy, Including False Light Privacy, Intentional Infliction Of Emotional Distress, Intentional Infliction Of Starvation, Medical Neglect, Torture, Falsifying Information, Providing False Information, Tampering, Tampering With Public Records/Information, Mail Tampering, Obstruction, And Malicious Prosecution Under The Laws Of The Commonwealth Of Pennsylvania. And This Court Has Supplemental Jurisdiction To Hear And Adjudicate State Law Claims.

WHEREFORE, Plaintiff Requests The Following Relief:

- a. Compensatory Damages; Amount Of 23,000,000 (Twenty Three Million Dollars).
- b. Punitive Damages; Amount 3,000,000 (Three Million Dollars).
- c. Reasonable Fees And Costs; Amount 1,310 (One Thousand Three Hundred Ten Dollars).
- d. Such Other And Further Relief As Appears Reasonable And Just;
- e. Enjoining And Enforcement On Defendants;
- b. Order By The Court As To Each Defendant And As To Each Count.

Respectfully Submitted,

TO THE COURT:

APRIL 19, 2018

DATE

Robert Taylor

ROBERT TAYLOR
P.O. Box 12524
Philadelphia, PA, 19151

DOCUMENT 1 OF 3 - ORDER

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT TAYLOR

Plaintiff

v.

THE COMMONWEALTH OF PENNSYLVANIA

THE COMMONWEALTH COURT (CJC)

AND

COMMONWEALTH COURT (CJC)

OFFICIAL JUDGE FRANK PALUMBO

THE CITY OF PHILADELPHIA

AND

CITY OF PHILADELPHIA POLICE

OFFICER OBRIEN NO. 7461

AND UNNAMED AND UNKNOWN

CITY OF PHILADELPHIA POLICE

OFFICERS

THE PHILADELPHIA PRISON SYSTEM/

DEPARTMENT OF PRISONS

CURRAN-FROMHOLD

CORRECTIONAL FACILITY

AND

WARDEN GERALD MAY

AND PRISON OFFICERS SERGEANT

LEBESCO

THE PHILADELPHIA SHERIFFS OFFICE

THE PHILADELPHIA PUBLIC DEFENDERS

ASSOCIATION AND PUBLIC DEFENDER

CHRIS ANGELO

Defendant (s)

ORDER

CASE NO.2-17-cv-03369

CIVIL ACTION NO.17-3369

ORDER

Document 2 of 3 - ORDER

IT IS ORDERED

**This Day Of Month And Year For monetary relief sought
also Preliminary and Permanent Injunction And Equity. Motion to Court is granted for the
following:**

- 1. Total damages, fees and costs in amount of 52,002,620 (Fifty Two Million Two Thousand Six Hundred Twenty Dollars)**
- 2. Enjoin The Philadelphia Prison System/Department Of Prisons, (CFCF) from overcrowding, no 3 inmate or 4 inmate celling.**
- 3. Enjoin The Philadelphia Prison System/Department of Prisons (CFCF) from mail restrictions, violations. The reading, inspecting of inmates incoming legal, Court mail, and to not open outside of inmate presence, no outgoing mail is to be opened, and no confiscation of legal or Court materials**
- 4. Enjoin The Philadelphia Prison System/Department Of Prisons, (CFCF) from unreasonable strip searches, and strip searches in plain view of other inmates.**
- 5. Enjoin The Philadelphia Prison System/Department Of Prisons, (CFCF) from female c/o pat-frisk body searches of male inmates, and otherwise c/o's not to search inmates of opposite gender.**
- 6. Enjoin The Philadelphia Prison System/Department Of Prisons, (CFCF) from confiscation of property.**
- 7. Enjoin The Philadelphia Prison System /Department Of Prisons, (CFCF) from corporal punishment, excessive lockdowns, and restrictions.**
- 8. Enjoin The Philadelphia Prison System/Department Of Prisons, (CFCF) lengthy confinement.**
- 9. Order For The Philadelphia Prison System/Department Of Prisons, (CFCF) to increase amount of food tray servings.**
- 10. Order For The Philadelphia Prison System/Department Of Prisons, (CFCF) to provide and make affordable access to inmates that require special dietary.**

ORDER

Document 3 of 3 - ORDER

11. Enjoin The Philadelphia Prison System/ Department Of Prisons, (CFCF) from prohibitions, threatened lock-ins', and punishments to inmates of Islamic Faith for "Free Exercise" freedom of religious beliefs to worship and peaceful assemblage on housing block activity area.

12. Order For The Philadelphia Prison System/Department Of Prison, (CFCF) to maintain and enable regular Islamic religious services.

13. Order For The Philadelphia Prison System/Department Of Prisons, (CFCF) to provide Islamic religious dietary.

14. Order For The Philadelphia Prison System/Department Of Prisons, (CFCF) to have Islamic chaplain.

15. Order For The Philadelphia Prison System /Department Of Prisons, (CFCF) to conduct proper classification.

16. Order For The Philadelphia Prison System/Department Of Prisons, (CFCF) to meet minimum medical care requirements.

17. Order For Philadelphia Prison System/Department Of Prisons, (CFCF) to be in full compliance of THE CONSTITUTION AND LAWS OF THE UNITED STATES or be shut down by THE UNITED STATES.

18. Enjoin The Philadelphia Police Department from enforcing unlawful arrest and seizure. Prescribed under stop, frisk or search and detention policy, practice, custom or usage.

19. Order to Enforce liens against defendants in absence of monetary compliance.

20. Enjoin Defendants from any retaliatory actions against Plaintiff for this action brought.

21. Retain jurisdiction over this matter to assure full compliance with the order of this court and with applicable law and require Defendant to file such reports as the Court deems necessary to evaluate compliance.

BY THE COURT:

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SUMMONS REQUEST: Summons In A Civil Action, Issuance, And Service,
Under Rule 4(a)(1), (b), (c)(1), Of The Federal Rules Of Civil Procedure.**

**CERTIFIED COPY REQUEST: Plaintiff Requests a Stamped Dated Certified Copy Of This Filing To
Be Returned To Plaintiff BY THE COURT. For This Plaintiff Has Sent a self addressed adhesive seal
envelope and an Additional Copy Of Filing.**

APRIL 19, 2018

DATE

Robert Taylor

ROBERT TAYLOR

for the

Signature of Clerk or Deputy Clerk

VERIFICATION

IN COMPLIANCE PURSUANT TO 28 U.S.C. § 1746 – UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY.

I verify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or verify under penalty of perjury that the foregoing document is true and correct."

Executed on

APRIL 19, 2018

DATE

Robert Taylor

ROBERT TAYLOR

CERTIFICATE

IN COMPLIANCE PURSUANT TO 28 U.S.C. § 1746 – UNSWORN
DECLARATIONS UNDER PENALTY OF PERJURY.

I certify that facts set forth are true and correct to the best of personal knowledge, information and belief. "I declare or certify under penalty of perjury that the foregoing is true and correct.

Executed on

APRIL 19, 2018

DATE

Robert Taylor

ROBERT TAYLOR

EXHIBIT (A)

CFCF ☒
 DC ☐
 HOC ☐
 PACC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name Robert TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
 (include date and time of incident)

DATE JUNE 24th 2016 / on / Around 6:30 pm

I received my official mail from court
 and the letter (mail) was opened and resealed
 with tape back prior to arrival and me signing
 for mail. This problem has happened 3 (times) incidents
 before this incident of the same opened mail
 before arriving to my person.

Action Requested by Inmate:

That no further opening of my court mail
 happen again and for this violation to stop.

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

Relayed above aforementioned to an official when
 this happened before

Date that you are depositing this Grievance in a grievance box:

Robert Taylor

(Signature of Grievant)

6-24-2016

(Date)

CFCF ☐
DC ☐
HOC ☐
PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name Robert TAYLORHousing Unit B 2-1

Intake Number _____

Police Photo Number 946529Description of Grievance, Incident or Problem
(include date and time of incident)

HAVE AGAIN Received my U.S. court MAIL From The clerk/OFFICE OF clerk opened and TAMPERED with BEFORE ARRIVAL And signing for it. This has occurred starting initially in April 19th ^{about} 2016 Then on date (5-21-16) (5-27-16) (6-24-16) (7-14-16). Also I WAS delayed in receiving this MAIL. This is a problem which CAUSES ERRORS And impedes my response and Reception of notification

Action Requested by Inmate:

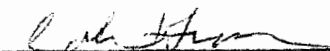
Requesting Action Be take N To stop this Violation And the individuals OR other Responsible entities Be held Accountable

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

At Time of Reception issue was brought up with officials

Date that you are depositing this Grievance in a grievance box:



(Signature of Grievant)

7-14-16

(Date)

Philadelphia Prison System

Inmate Grievance Form

DC ☐
HOC ☐
PICC ☐Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLOR Housing Unit B2-1
Intake Number _____ Police Photo Number 946529Description of Grievance, Incident or Problem
(include date and time of incident)

ON OR About 9:30 PM DATE 8-8-16 I Received court
MAIL opened And RESEALED BACK. I HAVE received my
MAIL previously open And TAMPERED with several
Times.

Action Requested by Inmate:

THAT COURT MAIL And documents ARRIVED secure And
untampered with And Hold those responsible Accountable

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

on July 19 2016 Last grievance on this matter seen officer
in unit management was told it would be checked into

Date that you are depositing this Grievance in a grievance box:

Robert Taylor
(Signature of Grievant)

AUG/8-9-16
(Date)

CCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
 (include date and time of incident)

COURT MAIL WAS BROUGHT IN FOR ME THIS MAIL WAS CLEARLY OPENED AND RESEALED BACK WITH TAPE. THERE WAS A LEGAL MAIL SHEET FOR ME TO SIGN BUT MY NAME WAS NOT ON THE LEGAL SHEET I WAS INSTRUCTED TO SIGN UNDER ANOTHER PERSON'S NAME I REFUSED TO DO THAT AND I WAS TOLD I WOULD NOT RECEIVE MY MAIL AS RESULT OF THIS I DID NOT RECEIVE MY COURT MAIL.

Action Requested by Inmate:

FOR THIS VIOLATION AND TAMPERING OF MAIL TO STOP THE DELAYING AND HOLDING OF MY MAIL AND THE WITHHOLD OF MY LEGAL COURT MAIL TO STOP AND TO BE GIVEN MY COURT MAIL

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

RELAYED INFORMATION AFOREMENTIONED AT TIME OF INCIDENT

Date that you are depositing this Grievance in a grievance box:

Robert Taylor
 (Signature of Grievant)

9-16-16
 (Date)

TO: THE PHILADELPHIA PUBLIC DEFENDERS ASSOCIATION
1441 SAMSON STREET
PHILADELPHIA, PA, 19102

FROM: ROBERT TAYLOR #946529
7901 STATE ROAD
PHILADELPHIA, PA, 19136

I hereby state that I have not retained or requested a lawyer/counsel with the public defenders association. If any lawyer/counsel from this association assumed representation of ROBERT TAYLOR #946529 it was without my knowledge or consent. And I inform the public defenders association that it does not represent ROBERT TAYLOR #946529 in any actions or said matters of court. If you may have a need to send anything in regard to this it can be sent to my mailing address.

AT: ROBERT TAYLOR
P.O. BOX 12524
PHILADELPHIA, PA, 19151

Robert Taylor

ROBERT TAYLOR

JANUARY 23, 2017

DATE

OFFICE OF THE CLERK

MARCIA M. WALDRON

UNITED STATES COURT OF APPEALS

TELEPHONE

CLERK

FOR THE THIRD CIRCUIT

215-597-4000

21400 UNITED STATES COURTHOUSE

601 MARKET STREET

PHILADELPHIA, PA 19106

Website: <http://www.ca3.uscourts.gov>

APR 23 2018

Resident
P.O. Box 12777
Philadelphia, PA 19151

Enclosure

We are returning money order #23502868648 in the amount of \$400.00 which represents payment for the Third Circuit. The money order should be sent to the U.S. District Court for the Eastern District of PA.

A money order in the amount of \$100.00 was also made out to the wrong court. A money order was also made out to the wrong court.

Thank you,

Very truly yours,

Waldron

Records

Enclosure

EXHIBIT (B)

CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
(include date and time of incident)

overcrowded celling

on/around AUGUST 23, 2016 7:50 AM. Since incarceration
HAVE BEEN subjected to and put in 3 (Three) PERSONS TO
a cell that is only to have 2 PERSONS in it. HAVE BEEN
FORCED TO STAY in this overcrowded condition throughout
duration of Detention being restricted to stay in cell up to
20 hours a day daily without being let out.

Action Requested by Inmate:

Address this matter to officials throughout my Detention
Action Requested to be brought out of this condition
And not be put BACK in it.

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

Brought matter to officials during my Detention

Date that you are depositing this Grievance in a grievance box:

Robert Taylor
(Signature of Grievant)

8-24-16
(Date)

ASD ☐
 CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529
 Description of Grievance, Incident or Problem
 (include date and time of incident)
November 21, 2016 6:44 PM

I Am SUFFERING PHYSICALLY FROM EXTREME
 cold AIR conditioning in the cell and on the
 Housing Block. This has BEEN happening For
 SEVERAL DAYS. DAY AND NIGHT with NO heat
 ONLY cold AIR blowing out of AIR vents. As Result
 I have to sleep in thermals, sweatshirt and
 Full uniform clothing. Throughout duration
 in this Facility have had to Endure cold ventilation
 conditions

Action Requested by Inmate:

Request That heat To Be ISSUED From vent system.
 And cell To be Regulated At Room Temperature

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

Related this to officials within DAYS OF GRIEVANCE

Date that you are depositing this Grievance in a grievance box:

Robert Taylor
 (Signature of Grievant)

11-22-16
 (Date)

ASD ☒
 CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐
 Name ROBERT TAYLOR Housing Unit B2-1
 Intake Number _____ Police Photo Number 996529

Description of Grievance, Incident or Problem (include date and time of incident)
ON/AROUND October 22, 2016 8:00 PM. I WAS
SUBJECTED TO STRIP SEARCH IN CELL IN FRONT OF TWO OTHER
INMATES. I DID NOTHING TO PRECIPITATE THIS UNWARRANTED
SEARCH. I HAVE BEEN PUT TO THESE STRIP SEARCHES WHICH
VIOLATE AND INVADE MY PRIVACY AT LEAST ONCE A MONTH
SINCE ENTERING THIS FACILITY. I ALSO AM SUBJECTED TO
PHYSICAL BODY SEARCHES WHEN GOING AND COMING FROM
VISITS OR ANY SERVICES IN THE FACILITY.

Action Requested by Inmate:
FOR THESE VIOLATIONS TO BE DISCONTINUED AND STOPPED

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.
BROUGHT THIS VIOLATION ISSUE FORTH TO OFFICIAL SINCE
DETENTION BEGAN.
Date that you are depositing this Grievance in a grievance box:
<div> <div>Robert Taylor</div> <div>(Signature of Grievant)</div> </div> <div> <div>10-25-16</div> <div>(Date)</div> </div>

Attachment 3.F.10.a

**PHILADELPHIA DEPARTMENT OF PRISONS
INMATE GRIEVANCE FORM**

☐ ASD ☒ CFCF ☐ DC ☐ HOC ☐ PICC ☐ RCF

NAME: ROBERT TAYLOR

HOUSING UNIT: D1-1

PID: 946529

INTAKE NUMBER: 1522426

Check box only if grievance is regarding Medical Services ☐

**Description of Grievance, Incident or Problem
(include date and time of incident)**

JUNE 25, 2017

on/AROUND Time 9:45 pm

UNREASONABLE SEARCH, SEIZURE AND ASSAULT

GRIEVANT WAS APPROACHED BY OFFICERS, SUPERVISOR SGT. LEBESCO AND C/O A. SMITH IN HIS CELL. GRIEVANT WAS UNREASONABLY STRIP SEARCHED WITH CELL DOOR OPEN AND HOUSING BLOCK OPEN FOR ACTIVITY WHERE HE COULD CLEARLY BE SEEN BY OTHERS IN THIS MANNER. FOLLOWING THE SEARCH SGT. LEBESCO ORDERED C/O A. SMITH TO DISCHARGE HIS CHEMICAL WEAPON AT GRIEVANT. GRIEVANT WAS SPRAYED IN FACIAL AREA PARTICULARLY IN HIS EYES. GRIEVANT WAS HANDCUFFED BEHIND HIS BACK AND MADE TO SUFFER UNDER RESTRAINT RESULTING IN IRREPARABLE INJURY. IN VIOLATION OF GRIEVANT'S CONSTITUTIONAL AND STATUTORY RIGHTS SECURED BY THE FOURTH, EIGHTH, AND FOURTEENTH AMENDMENTS.

Action Requested by Inmate:

TERMINATION OF BOTH EMPLOYEES

See Continuation of Grievance - Page 2 YES ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

INITIATED FORMAL DIRECT RESOLVE

Date that you are depositing this Grievance in a grievance box: JULY 7, 2017

Signature of Grievant: Robert Taylor

Date: JULY 7, 2017

EXHIBIT

(c)

ASD ☐
 CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name Robert TAYLORHousing Unit B2-1 cell 4

Intake Number _____

Police Photo Number 946527

Description of Grievance, Incident or Problem
 (include date and time of incident)

HAVE NOT BEEN RECEIVING PROPER FOOD ACCORDING TO MY RELIGION. AND I AM NOT ABLE TO PROPERLY PRACTICE, IMPLEMENT MY RELIGIOUS DUTIES BECAUSE OF OVERCROWDED CELLS AND LIVING CONDITIONS. THERE HAS BEEN NO ALLOCATED ROOMS OR SPACE PROVIDED. HAVE MADE PRIOR REQUESTS, MENTIONING NOTICE OF THIS. STILL NO ACTION HAS BEEN TAKEN.

THIS HAS OCCURRED STARTING FROM INCARCERATION UP TO CURRENT DATE

Action Requested by Inmate:

ISSUANCE OF VEGETARIAN, AND PROPER DIETARY MEALS, THE ENDING OF PROHIBITING RELIGIOUS PRACTICES EXERCISE INCARCERATION AND PROVIDING THE ALLOCATION OF SPACE AND AREA.

See: Continuation of Grievance - Page 2 Yes ☐ No ☒

Describe how and when you tried to resolve this Grievance informally.

ADDRESS ADMINISTRATION DURING MONTH OF DECEMBER AND JANUARY 2015 AND 2016

Date that you are depositing this Grievance in a grievance box:

(Signature of Grievant)

(Date)

☒ CFCF
☐ DC
☐ HOC
☐ PICC

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
(include date and time of incident)

JUNE 3, 2016

CURRENTLY on going - There is no provided area for
 me to make my daily religious PRAYERS, which is
 afforded to all those in institution of religious
 status EVERYDAY throughout the day. There is also
 Barring and NON-ALLOWANCE of PRAYING on the housing
 Block. Which is clearly AGAINST institutional policy.

Action Requested by Inmate:

TO go TO PROPER area TO perform religious duties / PRAYERS
 a number of times a day as required and on housing
 Block when it's open for activities.

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

Brought this to officials

Date that you are depositing this Grievance in a grievance box:

Robert Taylor

(Signature of Grievant)

6-3-16

(Date)

CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name Robert TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
 (include date and time of incident)

DUE TO MY RELIGIOUS PRACTICE AND DOCTRINE. AM CURRENTLY
 OBSERVING AND IMPLEMENTING MY RELIGIOUS DIETARY OF NOT EATING
 AND DRINKING DURING DAYLIGHT HOURS. SINCE BEGINNING MY
 RELIGIOUS PRACTICE OF THIS FOOD DIETARY I HAVE NOT BEEN
 RECEIVING MEALS ON TIME AT SUNDOWN AND HAVE BEEN SERVED
 MEALS 1 TO 2 HOURS AFTER MEAL (FOOD) IS DUE TO BE EATING.
 ALSO HAVE NOT RECEIVED HEALTHY, NUTRITIOUS, SUFFICIENT MEALS
 (FOOD) IN ACCORDANCE WITH PRACTICE AND BELIEF OF RELIGIOUS
 DIETARY. THIS BEGAN AND HAS BEEN HAPPENING STARTING FROM
 DATES ON/AROUND 6-6-2016 TO 6-10-2016 CURRENTLY

Action Requested by Inmate:

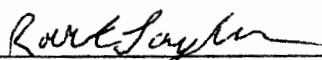
SERVE NUTRITIOUS SUFFICIENT MEALS ACCORDING TO RELIGIOUS
 BELIEFS PRIOR TO DAYLIGHT ENDING SO I MAY BE ABLE TO EAT
 AS SOON AS REQUIRED

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

MENTIONED TO FACILITY OFFICIALS AT START OF RELIGIOUS PRACTICE

Date that you are depositing this Grievance in a grievance box:



(Signature of Grievant)

6-10-2016

(Date)

ASD ☐
 CFCF ☒
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐Name ROBERT TAYLORHousing Unit B2-1

Intake Number _____

Police Photo Number 946529
 Description of Grievance, Incident or Problem
 (include date and time of incident)
12-20-16CURRENT CONTINUES PROBLEM.BEING DENIED PROPER AREA FOR RELIGIOUS SERVICES AND PRAYERS.THE INSTITUTION PROVIDES DESIGNATED PROPER AREAS FOR THESE RELIGIOUS DUTIES EVERYDAY A NUMBER OF TIMES A DAY FOR ALLTHOSE OF RELIGIOUS STATUS. HOLDING CELLS ARE IN APPROPRIATE AND INADEQUATE FOR THESE DUTIES, PRAYERS AS THERE IS OVERCROWDEDCONDITIONS WHICH THERE'S NO ROOM AND IT'S AGAINST MY RELIGION TO PRAY NEXT TO A TOILET. AS WELL AS OTHER ISSUES. BARRING.PROHIBITING, NON-ALLOWANCE AND DISCOURAGEMENT FROM RELIGIOUS PRAYER OR SERVICES ON THE HOUSING BLOCK ARE CLEARLY AGAINST INSTITUTIONAL POLICY.

Action Requested by Inmate:

PROPER AREA TO PERFORM RELIGIOUS DUTIES, PRAYERS EACH DAY THE AMOUNT OF TIMES A DAY AS REQUIRED AND NON-INTERFERENCE ON HOUSING BLOCK WHEN OPEN FOR ACTIVITIES.See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

BOUGHT THIS TO OFFICIALS. ALSO ADDRESS THESE ISSUES IN JUNE OF 2016.

Date that you are depositing this Grievance in a grievance box:

Robert Taylor
 (Signature of Grievant)

December 21, 2016
 (Date)

PHILADELPHIA DEPARTMENT OF PRISONS INMATE GRIEVANCE FORM			
<input type="checkbox"/> ASD	<input checked="" type="checkbox"/> CCF	<input type="checkbox"/> DC	<input type="checkbox"/> HOC
<input type="checkbox"/> PICC	<input type="checkbox"/> RCL		
NAME ROBERT TAYLOR	HOUSING UNIT: B2-1		
PID 946529	INTAKE NUMBER 1522426		
Check box only if grievance is regarding Medical Services <input type="checkbox"/>			
Description of Grievance, Incident or Problem (Include date and time of incident)			
<p>MARCH 3, 2017 2:24 Pm</p> <p>Institutional Deprivation of Religious exercise Religious Friday service which is to be held weekly. Did not TAKE PLACE. This Belief And exercise of my religious Faith HAVE BEEN DENIED me. Even for periods of up to (two) 2 months without taking place. There is also no daily provisions made OR allowed for my everyday PRAYERS OR assembly. There is NO provided OR access to a minister of my religion. Other Religions in institution have this and are provided religious prayers and service area which they attend leaving off the Housing area for up to (3) three times a day. There has And is constant continual institutional discrimination And harassment, infringement of my religion.</p>			
Action Requested by Inmate:			
<p>DAILY ACCESS TO AREA FOR PRAYERS AND service, religious minister for my Religion in the institution, and for religious mandatory service to take place weekly</p> <p>See: Continuation of Grievance - Page 2 YES <input type="checkbox"/> No <input type="checkbox"/></p> <p>Describe how and when you tried to resolve this Grievance informally.</p> <p>mentioned this to officials prior to this Grievance</p>			
Date that you are depositing this Grievance in a grievance box: MARCH 3, 2017			
Signature of Grievant: Robert Taylor		Date: MARCH 3, 2017	

EXHIBIT (D)

CFCF ☐
 DC ☐
 HOC ☐
 PICC ☐

Philadelphia Prison System

Inmate Grievance Form

Check box only if grievance is regarding Medical Services ☐

(Armband Name)
 Name Robert TAYLOR

Housing Unit B2-1 Cell 9

Intake Number _____

Police Photo Number 946529

Description of Grievance, Incident or Problem
 (include date and time of incident)

This matter is regarding medical. HAVE requested
 And need Vegetarian meals and Health shakes Also
 multivitamins w/minerals HAVE An Immune thyroid
 condition which requires this Proper dietary
 I HAVE been Losing weight, passing out and continuously
 getting sick

Action Requested by Inmate:

issuing Veggie meals shake, multivitamins/minerals - and Diet TEAS

See: Continuation of Grievance - Page 2 Yes ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

sent Request Form in to medical Explained also mention
 was seen and Explained All this threw out month of Dec 2015

Date that you are depositing this Grievance in a grievance box:

[Signature]

(Signature of Grievant)

1/1/16

(Date)



SICK CALL REQUEST

Check one: Dental ☐ Medical ☒ Mental Health ☐

Name: ROBERT TAYLOR Inmate I.D. Number 946529
(Print Name)

Social Security No. _____

Housing Unit: B2-1

Medical Problem (be specific): To The Doctor, I cannot eat the
usually served food which makes me sick. Nor any soy meat.
Have brought this notice since entrance in facility. To date I have lost
40 pounds and am struggling with my health. Need and request
special dietary trays of vegetarian meals, which you approve for
these circumstances. Respectfully requested

Inmate's Signature Robert Taylor Date: 12-26-16 Time: 10:25
FOR MEDICAL UNIT USE ONLY

Disposition: _____

Provider's Signature: _____ Date: _____ Time: _____

86-146



SICK CALL REQUEST

Check one: Dental ✓ Medical Mental Health

Name: ROBERT TAYLOR Inmate I.D. Number 946529
(Print Name)

Social Security No.

Housing Unit: B2-1

Medical Problem (be specific): I HAVE BEEN RECEIVING MY SPECIAL DIETARY SANDWITCH PACK WITH MEAT. I AM PRESCRIBED UNDER VEGETARIAN NO MEAT AS LABELED. RESPECTFULLY REQUEST THAT CHEESE (VEG) BE ISSUED IN MY SANDWITCH PACK SO THAT I MAY EAT AS REQUESTED WITHOUT MEAT

Inmate's Signature Robert Taylor Date: 2-19-17 Time: 5:36 PM

FOR MEDICAL UNIT USE ONLY

Disposition:

Provider's Signature: Date: Time:



SICK CALL REQUEST

Check one:

Dental

Medical ☒

Mental Health

Name: ROBERT TAYLOR

(Print Name)

Inmate I.D. Number 946529

Social Security No. _____

Housing Unit: B2-1

Medical Problem (be specific): I was prescribed Health shakes for my special diet condition back in November of 2016 which I have never received. On from this with me attending when I see for checkup on Feb 13 of 14, 2019. I was told I would be getting health shakes. I am suffering only and my physical condition is deteriorating. Respectfully request that I receive my Health shakes and that the problem be fixed.

Inmate's Signature Robert TaylorDate: 2-13-17Time: 2:00 PM

FOR MEDICAL UNIT USE ONLY

Disposition: _____

Provider's Signature: _____

Date: _____

Time: _____

PHILADELPHIA DEPARTMENT OF PRISONS INMATE GRIEVANCE FORM	
<input type="checkbox"/> ASD <input checked="" type="checkbox"/> CFCF <input type="checkbox"/> DC <input type="checkbox"/> HOC <input type="checkbox"/> PICC <input type="checkbox"/> RCF	
NAME: <u>ROBERT TAYLOR</u>	HOUSING UNIT: <u>32-1</u>
PID: <u>946529</u>	INTAKE NUMBER: <u>1522426</u>
Check box only if grievance is regarding Medical Services <input type="checkbox"/>	
Description of Grievance, Incident or Problem (Include date and time of incident)	
<u>TO ARAMARK - March 11 2017 6:37 PM</u> <u>DIETARY DEPRIVATION</u> <u>THIS Food Dietary service has been "deliberately</u> <u>indifferent" to my needs. My special Dietary Health</u> <u>SHAKES which were ISSUED to me November 2016 HAVE</u> <u>never been provided or distributed to me BY ARAMARK Dietary</u> <u>service. THIS has and is currently causing and suffering</u> <u>AS my physical medical condition of (Low Blood sugar, Chronic</u> <u>Thyroid, ANEMIA periodic Low Blood pressure, and severe weight</u> <u>Loss, which has at a point Reached 45 pounds Below weight</u> <u>Requires me to receive nutrient health shakes.</u>	
Action Requested by Inmate: <u>TO RECEIVE DIETARY health shakes AS soon as possible.</u>	
See: Continuation of Grievance – Page 2 YES <input type="checkbox"/> No <input type="checkbox"/>	
Describe how and when you tried to resolve this Grievance informally. <u>Brought this matter to officials and address this medical during checkups,</u> <u>evaluations. Last visit in February 2017.</u>	
Date that you are depositing this Grievance in a grievance box: <u>MARCH 12 2017</u>	
Signature of Grievant: <u>Robert Taylor</u>	Date: <u>MARCH 11, 2017</u>



SICK CALL REQUEST

Check one:

Dental

☒

Medical

Mental Health

Name: ROBERT TAYLOR

(Print Name)

Inmate I.D. Number 746529

Social Security No.

Housing Unit D-1-1Medical Problem (be specific): Need Asthma Inhaler immediately

Have been empty of Albuterol rescue inhaler for days. Am tired
and have been short of breath. Extremely struggling. Was informed
by previous sick call to get refill on Med from meds-line
but I was refused and told must go to medical. Respectfully Request
that treatment and Refill As soon as possible please.

Inmate's Signature Robert TaylorDate: 4-17-17Time: 8:20 PM**FOR MEDICAL UNIT USE ONLY**

Disposition:

Provider's Signature:

Date:

Time:

86-146

**PHILADELPHIA DEPARTMENT OF PRISONS
INMATE GRIEVANCE FORM**

☐ ASD ☒ CFCF ☐ DC ☐ HOC ☐ PICC ☐ RCF

NAME: ROBERT TAYLOR

HOUSING UNIT: 01-1

PID: 946529

INTAKE NUMBER: 1522426

Check box only if grievance is regarding Medical Services ☒

**Description of Grievance, Incident or Problem
(Include date and time of incident)**

APRIL 17, 2017 8:20PM Deliberate Indifference to medical needs

I had to go to medical on morning of April 18, 2017 for Asthma Breathing Treatment due to severe shortness of breathe and Hyperventilating - Asthma Attack. Later on immediate awaited response of sick call request I submitted regarding this medical problem of needing my Breathing Inhaler. Upon prior sick call was directed to meds-line for Asthma inhaler renewal. Went to meds-line and was sent back to medical. Neither care tended to this Emergency medical need. As result of not having my medicine I am not able to talk, walk to much and have been short of breathe for a week to date. And am suffering unduly which can result in fatality. In violation of my constitutional and statutory rights secured by the Eight and Fourteenth Amendments

Action Requested by Inmate:

respectfully Request For Issuance of Albuterol Asthma Inhaler and any further Appropriately needed medicine. so I can breathe

See: Continuation of Grievance - Page 2 YES ☐ No ☐

Describe how and when you tried to resolve this Grievance informally.

Sick call Request on April 17 2017 and before and discussed this with medical staff on April 16 + 17, 2017

Date that you are depositing this Grievance in a grievance box: 4-21-17

Signature of Grievant: Robert Taylor

Date: 4-21-17

PHILADELPHIA DEPARTMENT OF PRISONS INMATE GRIEVANCE FORM	
<input type="checkbox"/> ASD <input checked="" type="checkbox"/> CEFCF <input type="checkbox"/> DC <input type="checkbox"/> HOC <input type="checkbox"/> PICC <input type="checkbox"/> RCT	
NAME: <u>ROBERT TAYLOR</u>	HOUSING UNIT: <u>D1-1</u>
PID: <u>946529</u>	INTAKE NUMBER: <u>1522426</u>
Check box only if grievance is regarding Medical Services <input checked="" type="checkbox"/>	
Description of Grievance, Incident or Problem (Include date and time of incident)	
<u>April 21, 2017</u> <u>on/around 10:00 Am</u> <u>MEDICAL DENIAL/DELIBERATE INDIFFERENCE</u>	
<u>GRIEVANT/INMATE went to medical for emergency Breathing</u> <u>Treatment for his asthma AS GRIEVANT/INMATE has been</u> <u>without inhaler for days. GRIEVANT/INMATE was denied and refused</u> <u>Treatment BY TRIAGE medical STAFF reason given was that wheezing</u> <u>was not heard from his lungs and that's the only way to receive treatment</u> <u>After being repeatedly told by GRIEVANT/INMATE that his lungs</u> <u>were constricted and He could not breathe but barely having short</u> <u>breaths GRIEVANT/INMATE was told nothing could be done and that</u> <u>He was prescribed an inhaler a week before. GRIEVANT/INMATE told</u> <u>medical staff that that was a different medicine which medical kept</u> <u>GRIEVANT/INMATE does not have or use due to it making him sicker and</u> <u>having allergic reaction of throat swelling NAUSEA and other complications</u> <u>GRIEVANT/INMATE is usually issued his ALBUTEROL medicine but</u> <u>for some reason now is being refused it. As result GRIEVANT/INMATE</u> <u>is being put to undue suffering in violation of his constitutional</u> <u>and statutory rights secured by the Eight and Fourteenth Amendments</u>	
Action Requested by Inmate:	
<u>That GRIEVANT/INMATE Be given Treatment and His proper</u> <u>medicine</u>	
See: Continuation of Grievance – Page 2 YES <input type="checkbox"/> No <input type="checkbox"/>	
Describe how and when you tried to resolve this Grievance informally.	
<u>Before this written file on April 21, 2017 brought this to medical staff's</u> <u>attention as well as on April 17, 2017</u>	
Date that you are depositing this Grievance in a grievance box: <u>APRIL 21, 2017</u>	
Signature of Grievant: <u>Robert Taylor</u>	Date: <u>April 21 2017</u>

86-570 (Rev. 6/16) 1. Deputy Warden for Administration 2. Warden 3. Inmate's Receipt of Filing

RECEIVED
PO BOX 12524
PHILADELPHIA, PA, 19151

PRIORITY
★ MAIL ★



For Domestic Use Only



Label 10771, July 2013

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

601 MARKET STREET

PHILADELPHIA, PA, 19106

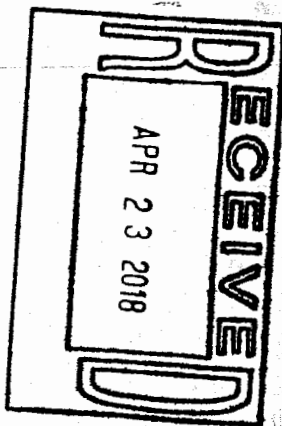


1005



19106

U.S. POSTAGE
PAID
PHILADELPHIA, PA
19124
APR 20, 18
AMOUNT
\$10.70
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PRIORITY
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